

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**JENNIFER KILGORE, and SHIRLEY HOWARD
INDIVIDUALLY AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED**

PLAINTIFFS

VERSUS

CIVIL ACTION NO. 1:25CV55-LG-RPM

**THE CITY OF MOSS POINT, MAYOR BILLY KNIGHT
AND THE CITY ALDERMEN, EACH IN THEIR OFFICIAL
AND ELECTED CAPACITY AND THE MOSS POINT
CHIEF OF POLICE, IN HIS OFFICIAL CAPACITY,
INTELLISAFE, LLC, JOHN DOES 1-10, AND
ACME COMPANIES 1-10**

DEFENDANTS

**DEFENDANT, INTELLISAFE, LLC’S RESPONSE IN OPPOSITION TO PLAINTIFFS’
MOTION TO ALLOW SUPPLEMENTAL FILING IN OPPOSITION TO MOTIONS
FOR DISMISSAL**

COMES NOW, Defendant, Intellisafe, LLC (hereinafter “Defendant” or “Intellisafe”), by and through undersigned counsel, and submits its Response in Opposition to Plaintiffs’ Motion to Allow Supplemental Filing of Journalistic Articles in Opposition to Motions for Dismissal, and would show unto the Court as follows:

1. Plaintiffs’ Motion is untimely and impermissible. Plaintiffs have not requested leave of court to amend their Responses to Defendants’ motions for dismissal, nor have they shown good cause or excusable neglect as to why this Motion was filed weeks after the time for motion papers concluded and/or was not included in their original responses.
2. The items presented by Plaintiffs are inadmissible hearsay.
3. Plaintiffs misapply Rule 902 (6) of the Federal Rules of Evidence, and it is inapplicable in this context.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Court deny Plaintiffs' untimely Motion and for any other and further relief that this Court deems just.

Respectfully submitted, this the 9th day of June, 2025.

/s/ S. Mitchell McCauley
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